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SPRINGFIELD TECHNICAL COMMUNITY COLLEGE



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DF98-10510
June 30, 1998



JOHN H. DUNN
EXECUTIVE VICE PRESIDENT
MANAGING AFFAIRS

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Amendment of Parts 21 and 74 to Enable Multipoint Distribution Service
And Instructional Television Fixed Service Licensees to Engage in Fixed
Two-Way Transmissions -- MM Docket No. 97-217 and RM-9060: EX
PARTE COMMUNICATION

Dear Ms. Salas:

I am writing on behalf of my organization in response to the Commission's June 12, 1998 Public Notice in the above-referenced proceeding requesting comment on certain ex parte proposals advanced by several parties over the past few months. We support the Commission expeditious adoption of new rules and policies governing two-way ITFS and MDS operations that are consistent with the proposals advanced by the industry task force (the "Petitioners").

My organization is an ITFS licensee and leases excess channel capacity to a subsidiary of CAI Wireless systems, Inc., a commercial wireless cable operator. The two-way proposals advanced by the Petitioners, and bolstered by the supporting material in their ex parte filings, will facilitate the introduction of two-way capabilities for MDS and ITFS licensees and will serve several primary objectives. First, the substantial benefits of two-way technology will be available not only for commercial applications, but also for educators and other ITFS licensees. Unlike proposals that would limit return paths to MDS channels or would effectively preclude the use of most ITFS channels for return paths by requiring unnecessary frequency separation, the Petitioners' proposal allows all ITFS licensees to use their own channels for return path applications if they choose, rather than artificially limiting return paths in a way that precludes use by many ITFS licensees.

Second, the Petitioners are proposing to retain the existing interference protection standards, which will ensure that ITFS licensees will be adequately protected from harmful interference from two-way response stations in a market. As detailed in the ex parte material submitted by Petitioners, before constructing two-way response stations in a market, MDS applicants must submit detailed interference analyses with their

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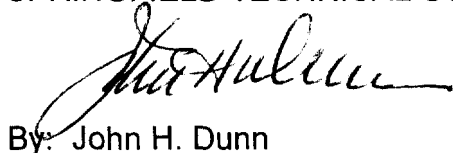
applications showing compliance with the existing 45 dB (for co-channel stations) and 0 dB (for adjacent-channel stations) interference ratios. In addition, the Petitioners are proposing that the operator of any response station found to cause harmful electrical interference must cure that interference. As a result, the interference protection rules and policies proposed by the Petitioners in the ex parte filings fully protect our interests, and we support their adoption.

Finally, we support the Petitioners' proposals for eliminating delays in the processing of applications and the inauguration of two-way services. Both the ITFS community and commercial operators have been hindered by application processing delays. Because CAI and my organization will be competing against a variety of other providers of two-way services that are not subject to regulatory delay, it is essential that the Commission's new rules permit the rapid inauguration of two-way services, without application processing delays or unnecessary testing requirements.

The system proposed by Petitioners will allow for the rapid and safe deployment of two-way services, and we support their expeditious adoption. Thank you for your consideration of these views.

Respectfully submitted,

SPRINGFIELD TECHNICAL COMMUNITY COLLEGE



By: John H. Dunn

Its: Executive Vice President/
Academic Affairs

JHD/mao

cc: Andrew M. Scibelli, President